

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Docket No. S2 20 Cr. 412 (AT)

-v.-

TIMOTHY SHEA,

Defendant.

DEFENDANT'S SENTENCING MEMORANDUM
ADDENDUM

ADDITIONAL EXHIBITS

Counsel for TIMOTHY SHEA respectfully asks that the Court accept a late filing of the attached exhibits (letters from friends and family) which counsel was unable to obtain in time to submit with the Sentencing Submissions filed on April 12, 2023 (for the reasons stated in a motion to postpone the sentencing hearing).

Exhibit B. Letter from Clinton Dorris (family friend)

Exhibit C. Letter from Kendra Landrey (family friend)

Exhibit D. Letter from Katelyn Mary Phipps (sister in law)

Exhibit E. Letter from Andrew Phipps (brother in law)

Exhibit F. Letter from Michael Shea (brother)

Exhibit G. Letter from H___ Shea (minor daughter)

Exhibit H. Letter from Phyllis Shea (mother)

Exhibit I Letter from J__ Shea (minor son)

Dated: New York, New York
April 12, 2023

Respectfully submitted,

/s/ Thomas H. Nooter

Thomas H. Nooter
Attorney for Defendant
Freeman, Nooter & Ginsberg
75 Maiden Lane, Suite 503
New York, NY 10038
(212) 608-0808
Email: nooteresq@gmail.com

cc: Office of the United States Attorney (by ECF)
Attention: AUSA Robert B. Sobelman, Esq.
AUSA Mollie Bracewell, Esq , and Derek Wikstrom, Esq.